

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 21-108 (PAM/TNL)

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	AMENDED JOINT MOTION TO
v.	)	CONTINUE DEADLINE FOR
	)	FILING SENTENCING
DEREK MICHAEL CHAUVIN,	)	POSITION PLEADINGS
	)	
Defendant.	)	
	)	

COMES NOW the Defendant, by and through his counsel Eric Nelson, joined by the United States of America, by and through its undersigned attorneys, LeeAnn K. Bell, Assistant United States Attorney for the District of Minnesota, and Samantha Trepel, Special Litigation Counsel for the Civil Rights Division (together “the parties”), and respectfully move the Court for an Order continuing the time to file their Sentencing Position Pleadings until June 22, 2022.

Defendant is pending sentencing following guilty pleas to two federal civil rights violations. The parties’ sentencing positions are currently due on June 8, 2022. There is no sentencing date currently set, and thus, a continuance will not impact any previously scheduled hearing. Initially, the parties requested that the deadline be moved to July in light of the state trial of two of co-defendants in a closely related matter which was set to begin jury selection on June 13, 2022. The parties have since learned that the state trial has been continued until January 2023, and thus, are filing this amended motion to continue

the deadline for filing sentencing position pleadings for two weeks, until June 22, 2022, to give the parties sufficient time to complete their position pleadings.

Dated: June 7, 2022

Respectfully submitted,

ANDREW M. LUGER  
United States Attorney

KRISTEN CLARKE  
Assistant Attorney General  
Civil Rights Division

/s/ LeeAnn Bell

BY: LEEANN K. BELL  
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/s/ Samantha Trepel

BY: SAMANTHA TREPEL  
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/s/ Eric Nelson

Eric J. Nelson  
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